




<p>QUALITY MANAGEMENT SYSTEM</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 1 OF 11</p>
---	--	--

QUALITY MANAGEMENT SYSTEM:

CODE OF CONDUCT

<p>Document Type :</p> <p style="text-align: center;">CODE OF CONDUCT</p>		<p>Document Identification:</p>	
		<p>ECD-HQ-002</p>	<p>Document language</p>
<p>Custodian: ECD Originators Department e.g. Ops, HSE. HR etc</p>		<p>HR/ECD Directors</p>	
		<p>English</p>	

Rev	Date (DD/MM/YY)	Description	Checked by (signature)	Checked by (signature)	Approved by (signature)
1	20/02/18	FOR ISSUE	HR Manager Nick Gammon	Group Compliance Officer: Chris Finn	Director Ben Drummond

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>EC Drummond (Agriculture) Ltd Arable Soft fruit Poultry</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 2 OF 11</p>
---	--	--

Copyright statement



This document has been prepared for the sole benefit, use and information of EC Drummond & Sons, EC Drummond (Agriculture) Ltd, BGD and Coverhill Facilities Maintenance Ltd and their advisers. The liability in respect of the information contained in the document will not extend to any third party. All concepts and proposals are copyright © 2018.

Issued in Commercial Confidence.



Index

	General	4
1.	Customers	4
2.	Suppliers	4
3.	Shareholders	5
4.	The Community	5
5.	Our Environment	5
6.	Behavioural Standards	6
7.	Corporate Social Responsibility (CSR)	6
8.	Working Standards	7
9.	Equal Opportunities (EO)	7
10.	Health and Safety	8
11.	Transparency	8
12.	Adherence to Policy	9
13.	Anti-bribery	9
14.	Law & Regulations	11
15.	Further Details	11

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>EC Drummond (Agriculture) Ltd Arable Soft fruit Poultry</p>  <p><small>Coverhill Facilities Management & Maintenance</small></p>	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 4 OF 11</p>
--	--	--

General

The vision of EC Drummond is to “operate a family based and sustainable agri-business that provides solid returns for future generations to continue in the farming sector” and this in turn leads to our mission being “to provide the highest quality products for our customers and partners, in a sustainable way that delivers profitable returns for all parties”.

One of our key values is to operate ethically, keeping the environment and social issues at the core of our thinking and belief.

EC Drummond is committed to:

- Providing continuous supply of the highest quality and ethically sourced produce whilst being committed to the development and maintenance of business relationships based on fair treatment of all workers in the supply chain.
- Protecting and enhancing the environment, we are committed to the proper management of waste and the reduction of pollution and compliance with all current legislation through effective staff training.
- Supporting our employees to develop their potential. Our policy is to exceed the minimum requirements of the law where possible and to do this we will provide sufficient resources to make this commitment. We will also ensure that systems are in place which will allow us to maintain, monitor and, where necessary, improve safety performance. Included in these systems will be means to allow communication and consultation on Health and Safety matters between all levels of the business.
- Delivering sufficient profits to finance the sound and steady growth of our business while providing shareholders with a return on investment and providing staff with the opportunity to share the benefits through business growth.

Code of Conduct


1. Customers

1.1 EC Drummond is dedicated to providing our customers with ethically driven produce of only the highest integrity and quality, ensuring we meet or exceed customer, legal and regulatory standards where applicable.

1.2 Pioneering procurement, technical excellence and operational efficiency ensures we meet the needs of our customers, balancing the need for investment and affordability to our customers.

2. Suppliers

2.1 EC Drummond is committed to the development and maintenance of business relationships based on fair treatment of all workers in the supply chain.

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 5 OF 11</p>
---	--	--

2.2 Furthermore, we also expect our suppliers to conform with all local and national laws relating to employment and social issues. This policy applies to all sites operated by EC Drummond and to the operatives that supply products to EC Drummond or to customers on our behalf. Suppliers are encouraged to extend similar policies to their sub suppliers and growers. Immediate remedial action will be required for any supplier found disregarding any aspect of socially responsible trading. We expect our suppliers to be registered and complete the self-assessment on SEDEX, an on-line ethical trading database or other similar system. The commercial relationship will be reviewed with any supplier that refuses to implement measures regarding socially responsible trading and in extreme cases this may result in the termination of our trading relationship.

2.3 We will pay suppliers on time and according to agreed terms.

3. Shareholders

3.1 We aim to provide an appropriate return for shareholders and meet our financial commitments by ensuring our business generates an appropriate level of profit and is sustainable.

3.2 We prepare accounting statements on a timely basis and in accordance with the applicable accounting standards.

4. The Community

4.1 EC Drummond is committed to serving our local community by providing employment opportunities and enhancing our local environment.

4.2 We report publicly our achievements on our website and through other appropriate social media channels


5. Our Environment

5.1 EC Drummond recognises our business activities have direct and indirect environmental impacts and that we have a duty to manage these in a responsible manner and is committed to respecting and acting in the best interests of the environment, across all of its operations.

5.2 We are committed to the proper management of waste and the reduction of pollution and compliance with all current legislation, through effective training.

5.3 It is our policy to reuse, recycle/compost, recover energy from and/or dispose of waste that is produced in a responsible manner. We believe that by implementing this policy we will help to deliver this objective for our employees and customers.

5.4 We are committed to continuous improvement to minimise our impacts on the environment with regards to our employees, our clients and the general public. We intend working in accordance with ISO 14001 and ensure compliance with all environmental

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 6 OF 11</p>
---	--	--

legislation and regulations pertinent to our activities is a minimum requirement and an integral part of our policy. The aspects are reviewed on a regular basis to ensure that all current aspects have been identified and that they are correctly prioritised.

6. Behavioural Standards

6.1 EC Drummond expects the behavioural standards of its employees, workers or sub-contractors to be impeccable and comply with relevant laws and standards which include:

- Professional and technical competence
- Honesty and integrity
- Professional ethics
- Compassion, respect and dignity
- Discretion and confidentiality
- Social and environmental responsibility


6.2 These standards are the responsibility of all and are entirely integral to the working procedures and ethics of EC Drummond.

7. Corporate Social Responsibility (CSR)

7.1 EC Drummond is committed to operating with a strong sense of integrity and recognises that we must integrate into our business values and operations to meet the expectations of stakeholders, who include our customers, clients, employees or sub-contractors, our suppliers, the community and the environment.

7.2 How do we achieve this?

- We recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business.
- We aim to demonstrate these responsibilities through our actions, policies and procedures.
- We take seriously all feedback that we receive from our stakeholders and where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p align="center">EC DRUMMOND</p> <hr/> <p align="center">CODE OF CONDUCT</p> <hr/> <p align="center">ECD-HQ-002</p>	<p align="right">20/02/2018</p> <p align="right">VER: 1</p> <p align="right">PAGE: 7 OF 11</p>
---	---	--

- We shall be open and honest in communicating our policies, strategies, targets, performance and governance to our stakeholders, in our continual commitment to sustainable development and improvement.

7.3 EC Drummond Directors assume accountability for this policy and will make the necessary resources available to realise our responsibilities. The responsibility of the organisations performance for this policy rests with all individuals throughout the company.

8. Working Standards

8.1 Good working standards are crucial to the development of EC Drummond and the potential of its employees, workers and sub-contractors. Maintenance of efficient and safe working practices and competitive remuneration packages reduces the risk of staff turnover which in turn provides for a more stable and productive organisation.



8.2 In line with these procedures EC Drummond follows best practice by always ensuring the appropriate insurance with the most suitable levels of protection for employees, workers and sub-contractors is in place to cover medical issues, loss of earnings, assets and business risk.

8.3 We have in place a Whistle blowing policy, enabling employee feedback which can be anonymous if desired and the system protects those who wish to raise concerns about the business that they believe is unethical.

9. Equal Opportunities (EO)

9.1 EC Drummond is an equal opportunities employer. This means that it is the Company's policy that there should be no discrimination against or harassment of any employee or job applicant either directly or indirectly on the grounds of:

- Race, colour, nationality or national or ethnic origin ("race")
- Sex or marital status
- Disability (e.g. a long term mental or physical impairment)
- Sex change status
- Sexual orientation
- Religion or philosophical belief
- Political belief
- Trade union activity (if applicable) or

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>EC Drummond (Agriculture) Ltd Arable Soft fruit Poultry</p> 	<p style="text-align: center;">EC DRUMMOND</p> <hr/> <p style="text-align: center;">CODE OF CONDUCT</p> <hr/> <p style="text-align: center;">ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 8 OF 11</p>
---	--	--

- Age

9.2 The Company's policy is to:

- Eliminate, as far as is reasonably possible, discrimination and harassment from the workplace.
- Encourage all its employees to take an active role against all forms of discrimination and harassment.
- Deter employees from participating in discriminatory behaviour or harassment.
- Demonstrate to all employees that they can rely upon the Company's support in cases of discrimination or harassment at work.

9.3 The Company is fully committed to providing a good and harmonious working environment that offers equal treatment and equal opportunities for all employees and where every employee is treated with respect and dignity. The Company's aim is that remuneration, recruitment, promotion and retention should not be affected by irrelevant considerations and stereotyping.

10. Health and Safety (H&S)

10.1 EC Drummond takes its Health and Safety record seriously and ensures the continued protection of all those employees, sub-contractors and clients who interact with or works for the organisation.

10.2 Our statement of Health and Safety Policy is shown in our company Business Management System (BMS).


10.3 EC Drummond will continuously monitor and adapt processes to ensure the highest priority on promoting health and safety within the workplace.

11. Transparency

11.1 EC Drummond will maintain transparency in all of its actions, as far as is feasibly possible without compromising legislative rules and regulations or client confidentiality.

12. Adherence to Policy

12.1 With the organisation aiming to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with its principles and policies will not be tolerated. Any action by either an employee or sub-contractor, which deliberately or recklessly breaches this Code of Conduct policy, may result in disciplinary action and where appropriate, criminal proceedings will be initiated.

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>Coverhill Facilities Management & Maintenance</p>	<p style="text-align: center;">EC DRUMMOND</p> <hr/> <p style="text-align: center;">CODE OF CONDUCT</p> <hr/> <p style="text-align: center;">ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 9 OF 11</p>
---	--	--

12.2 The oversight and management of EC Drummond operations is the responsibility of its Directors.

13. Anti-bribery policy

Definition

13.1 Bribery is the acceptance of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed, in this organisation, to ensure that no bribery occurs.

Unacceptable behaviour

13.2 The following behaviour is unacceptable, and must not occur in this organisation:

- accepting any financial or other reward from any person in return for providing some favour;
- requesting a financial or other reward from any person in return for providing some favour;
- offering any financial or other reward from any person in return for providing some favour.

Business gifts

13.3 From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the Company Directors and recorded. No gifts with a value of more than £50 may be accepted. If a gift is offered and then refused because of its value, this must again be reported to the Company Directors.



Hospitality

13.4 From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the Directors and permission must be given before an employee accepts any invitation.

Offering gifts and hospitality

13.5 It is this organisation's custom to on occasion offer small gifts to customers, suppliers and other persons. If a gift is authorised [by a Director] the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

13.6 This organisation may occasionally arrange hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from a Director.

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>EC Drummond (Agriculture) Ltd Arable Soft fruit Poultry</p> 	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 10 OF 11</p>
---	--	---

Responsibilities of the Head of Departments

13.7 The Directors are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in the respective areas of responsibility.

13.8 If Managers/Supervisors are concerned about any actions, they should contact a Director or the HR Manager immediately for advice.

13.9 Managers/Supervisors are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

13.10 Directors must authorise all expense claims from their employees. Directors are expected to check and sign all expense claims from their employees against receipts.

13.11 Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

13.12 Any employee who is concerned that they are/or believe they are being bribed should report this matter to the HR Manager immediately.

Disciplinary action

13.13 Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns



13.14 If an employee is concerned that acts of bribery are occurring in the organisation they should inform the HR Manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.

Action to be taken

13.15 In the event that any form of bribery is identified within the company, then a board will be convened by senior management and a detailed investigation be carried out and reported back to the Directors.

14. Law and Regulations

14.1 We will comply with all applicable laws and regulatory standards.

<p>QUALITY MANAGEMENT SYSTEM</p>  <p>EC Drummond (Agriculture) Ltd Arable Soft fruit Poultry</p> 	<p>EC DRUMMOND</p> <hr/> <p>CODE OF CONDUCT</p> <hr/> <p>ECD-HQ-002</p>	<p>20/02/2018</p> <p>VER: 1</p> <p>PAGE: 11 OF 11</p>
---	--	---

14.2 We will comply with statutory obligations in relation to direct and indirect taxes, maintaining a professional relationship with all authorities and regulatory bodies.

15. Further Details

15.1 For further details on any of the above mentioned policies or to receive advice on the respective policies please contact the HR Manager